

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JESSICA DENSON, Individually and on
Behalf of All Others Similarly Situated,

Plaintiffs,

v.

DONALD J. TRUMP FOR PRESIDENT, INC.,

Defendant.

No. 20 Civ. 4737 (PGG)

**DECLARATION OF DAVID A. SCHULZ IN SUPPORT OF
PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**

David A. Schulz hereby declares as follows:

1. I am a member of the Bar of this Court and Senior Counsel in the law firm of Ballard Spahr LLP, co-counsel for plaintiffs in this action. I make this Declaration in support of plaintiffs' motion for class certification, to describe my qualifications and demonstrate that the proposed class will be adequately represented by me and my co-counsel.

2. I am a 1974 graduate of Knox College and a 1978 graduate of Yale Law School. Before joining Ballard Spahr, I was an associate and then partner at the firm Rogers & Wells (now Clifford Chance) from 1978 to 2003, and a name partner in a leading First Amendment litigation boutique firm Levine, Sullivan, Koch & Schulz, from 2003 until the firm merged with Ballard Spahr in 2017. I have over 40 years' experience as a litigator, focusing on media, entertainment, and First Amendment law. I am ranked as a Senior Statesman for First Amendment litigation by Chambers USA, and have been listed in *Best Lawyers in America* for First Amendment law and Media Law every year since 2000.

3. In addition to my law practice, I am the founding director of the Media Freedom and Information Access Clinic at Yale Law School, where I also serve as a Clinical Lecturer and a Senior Research Scholar. The MFIA Clinic is a student clinic providing pro bono assistance to journalists, researchers and advocacy groups in defense of their newsgathering and publication rights and in support of their efforts to access government information.

4. I have been involved in several class actions over the course of my career, including *Wang v. Hearst Corporation*, No. 12-cv- 0793HB (S.D.N.Y.) and *Brewery Delivery Workers v. Moseley*, No. 80-1476 (E.D.N.Y.).

5. In addition to this Court, I am admitted to the bar in New York, the District of Columbia, and Connecticut; the U.S. District Courts for the Eastern, Western, and Northern Districts of New York, the District of Columbia, and the District of Connecticut; the U.S. Courts of Appeal for the Second, Third, Fourth, Fifth, Ninth, and Tenth Circuits; and the U.S. Supreme Court. I currently serve as an appointee of the Governor on the New York Committee on Open Government, and am a past Chair of the Media Law Committee of the International Bar Association, the IP Council of the Association of the Bar of the City of New York, the Defense Counsel Section of the Media Law Resource Center, among other leadership roles.

6. Attached hereto as Exhibit 1 is a true and correct copy of my law firm bio page, which provides additional information regarding my qualifications and credentials.

I declare under penalty of perjury that the foregoing is true and correct. Executed on September 29, 2022, in New York, New York.

By: /s/ David A. Schulz
David A. Schulz